

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**WSOU INVESTMENTS LLC D/B/A  
BRAZOS LICENSING AND  
DEVELOPMENT,**

*Plaintiff,*

**v.**

**ZTE CORPORATION, ZTE (USA) INC.  
AND ZTE (TX), INC.,**

*Defendants.*

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**C.A. NO. 6:20-cv-00487-ADA**

**DEFENDANTS' UNOPPOSED MOTION TO WITHDRAW ATTORNEYS OF  
RECORD**

Defendants ZTE Corporation, ZTE (USA) Inc. and ZTE (TX), Inc. (collectively "ZTE") file this motion to withdraw as counsel of record David Royce Keesling, Erick Scott Robinson, and Timothy Scott Kittle, each of Dunlap Bennett & Ludwig PLLC. The reason for this request is a change in law firms representing ZTE, and accordingly, Mr. Keesling, Mr. Robinson, and Mr. Kittle no longer represent ZTE in this action. ZTE will remain represented by at least the following counsel:

Lionel M. Lavenue  
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**FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP**  
1875 Explorer Street, Suite 800  
Reston, VA 20190  
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Pursuant to Local Rule CV-7, counsel contacted counsel for Plaintiff WSOU Investments LLC, who stated that they do not oppose this motion. Accordingly, Defendants respectfully request that the Court withdraw David Royce Keesling, Erick Scott Robinson, and Timothy Scott Kittle as attorneys of record in this case.

DATED: November 6, 2020

Respectfully submitted,

/s/Lionel M. Lavenue

Lionel M. Lavenue

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Attorney for Defendants,

ZTE Corporation

ZTE (USA), Inc.

ZTE (TX), Inc.

**CERTIFICATE OF CONFERENCE**

Defendant states that (1) counsel has complied with the meet and confer requirements of Local Rule CV-7, and (2) that counsel for the Defendant has stated that they do not oppose this motion.

/s/Lionel M. Lavenue

Lionel M. Lavenue

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on November 6, 2020.

/s/Lionel M. Lavenue

Lionel M. Lavenue